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February 17, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Application of SBC Communications for Authority to Provide
In-Region InterLATA Services in Texas
CC Docket No. 00-4

Dear Ms. Salas:

Pursuant to Section 1.1206 of the Commission's rules, the Competitive Telecommunications Association ("CompTel"), by its undersigned counsel, hereby gives notice that on February 16, 2000, its representatives met with Bill Dever, Audrey Wright, John Stanley, Claudia Fox, Daniel Shiman, Jessica Rosenworcel and Claire Blue of the Common Carrier Bureau. Representing CompTel were Carol Ann Bischoff, Executive Vice President and General Counsel, Terry Monroe, Vice President of State Affairs, Rina Hartline of Birch Telecom, and the undersigned. Also participating by telephone were: Nelson Fox and Mitch Elliott of NTS Communications, Craig Cook of Cap Rock Communications, and Rick Tidwell and Patti Kettler of Birch Telecom.

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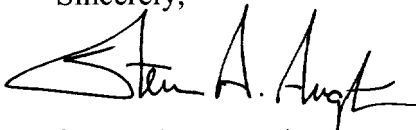
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KELLEY DRYE & WARREN LLP

Ms. Magalie R. Salas
February 17, 2000
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The attached document summarizes CompTel's presentation. In accordance with Section 1.1206(b), an original and one copy of this notice is being provided.

Sincerely,



Steven A. Augustino

SAA:pab

cc: FCC staff listed above

CompTel *Ex Parte* Presentation

*Application of SBC Communications Inc.
Pursuant to Section 271 of the
Telecommunications Act of 1996 to Provide In-
Region, InterLATA Services in Texas*

(CC Docket 00-4)

February 16, 2000

When Close is Not Enough: The Importance of Saying No

Despite Progress in Some Areas, SWBT Does Not Satisfy Section 271:

- SWBT's 3-Order Process for UNE-P Orders is Unlawful
- SWBT Is Unable to Provision Interconnection Trunks at Commercial Volumes
- SWBT Does Not Follow its FDT Hot Cut Procedure on a Reliable Basis
- Swift and Effective Post-Entry Enforcement Must be Assured at the Federal Level

SWBT's UNE-P Provisioning Process is Unlawful and Causes Significant Customer Disruption

- The “Tear Down and Reconstruct” Process Unlawfully Breaks Apart Existing Network Elements
 - Section 315(b) Prohibits ILECs from “sabotag[ing] their network” to increase a requesting carrier’s costs.
- The Lack of an “As-is” Migration Discriminates Against Competitive Carriers by Subjecting Them (and their customers) to the Risk of Improper Provisioning

Customer Disruptions Caused by SWBT's Tear Down and Reconstruct Process

- Loss of Dial Tone Completely
- Loss of Inbound or Outbound Calling
- Loss of Vertical Features
- Erroneous IntraLATA Toll PICs
- Failure to Post/Double Billing and Other Problems
- Errors Occurred on 14% of Network Intelligence's Orders

SWBT Unreasonably Delays Provisioning of Interconnection Trunks

- Problems Are Not Confined to One Carrier or One City
- NTS, CapRock, e.spire and Others Have Experienced Problems in Lubbock, Amarillo, Dallas and Elsewhere
- SWBT Holds Orders for a Lack of Facilities Even When the CLEC Forecasts Accurately
- In Some Carriers' Experience, Delays Affect only Local Interconnection Trunks, Not Interexchange Trunks for the Same End Offices

Examples of Trunking Delays

- Delays of 30 Days or More in Providing a Service Planning Document
- Failure to Provide Timely FOCs, Resulting in Unnecessary Supplements to Push Back the Due Date
- Repeated Claims of a Lack of Facilities (100 % of NTS' December 1999 Orders were Delayed Due to a Lack of Facilities)

SWBT's Hot Cut Provisioning is Deficient

- SWBT Metrics Do Not Capture FDT Performance
- SWBT Did Not Follow FDT Procedures on 30% of NTS Orders Between October and December 1999
- Most Common Errors are Premature Cutovers
- FDT Performance Has Slowed the Pace of Competitors' Entry